

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

LINDA SUN,

a/k/a “Wen Sun,” “Ling Da Sun,” and  
“Linda Hu,” and

CHRIS HU,

*Defendants.*

24 Cr. 346 (BMC) (TAM)

**NOTICE OF MOTION**

***(Oral Argument Requested)***

**PLEASE TAKE NOTICE**, that defendant LINDA SUN, a/k/a “Wen Sun,” “Ling Da Sun,” and “Linda Hu,” by and through the undersigned counsel, and in reliance upon the accompanying memorandum of law, will move before the Honorable Brian M. Cogan, United States District Judge for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, NY 11201, on a date and time to be fixed by the Court, for an order dismissing Counts 1–7 and 10 of the indictment (Dkt. 4), and for such other and further relief as the Court deems just and proper.

Dated: November 4, 2024  
New York, New York

Respectfully submitted,

/s/ Jarrod L. Schaeffer

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Jarrod L. Schaeffer  
Scott Glicksman

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